

<b>RACHEL RAMSBOTTOM, ALEXIS</b>	)	
<b>BOWLING, JENNA HOUSTON,</b>	)	<b>CIVIL ACTION NO. 3:21-cv-00272</b>
	)	
<b>Plaintiffs,</b>	)	
	)	
	)	
<b>v.</b>	)	
	)	<b>JUDGE ALETA A. TRAUGER</b>
	)	
<b>LORIN ASHTON,</b>	)	
	)	
<b>Defendant.</b>	)	
	)	

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1100 Ludlow Street, Suite 300  
Philadelphia, PA 19107  
(T): (215) 399-9255  
(E): bkent@lbk-law.com  
sryan@lbk-law.com  
amacmaster@lbk-law.com  
*\*admitted pro hac vice*

**MILLER LAW OFFICES**

Phillip Miller, #006873  
*Attorney for the Plaintiff*  
631 Woodland Street  
Nashville, TN 37206  
615-356-2000 phone  
pmiller@seriousinjury.com

Date: October 14, 2022

**RACHEL RAMSBOTTOM, ALEXIS**  
**BOWLING, JENNA HOUSTON,**

**Plaintiffs,**

**v.**

**LORIN ASHTON,**

**Defendant.**

CIVIL ACTION NO. 3:21-cv-00272

JUDGE ALETA A. TRAUGER

Pursuant to the Local Rules of Court for the United States District Court, Middle District of Tennessee 5.03 and 7.01 Plaintiffs Rachel Ramsbottom, Alexis Bowling, and Jenna Houston hereby move the Court for Leave to File Certain Exhibits Under Seal and in support thereof, aver as follows:

On June 20, 2022, Defendant Lorin Ashton produced Objections and Responses.

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discovery related to other victims who are not plaintiffs in this lawsuit,” and “whether the plaintiffs may seek discovery of confidentiality agreements and settlements that the defendant has made with persons who are not parties to this lawsuit.”

Also discussed during the September 28, 2022, conference was the status of a Protective Order to be entered in this case. The Court provided guidance to the parties regarding certain provisions of same. The parties represented to the Court that the parties had agreed, pending the entry of the Protective Order, that all discovery materials exchanged would be made confidential. This agreement was reached given the fact that discovery materials will include certain personal and sensitive information that the parties will wish to mark as confidential. The parties had previously reached this agreement so as to facilitate the ongoing exchange of discovery materials while awaiting the entry of the Protective Order. It is the understanding and recollection of counsel for Plaintiffs that the Court approved of this protocol.

On October 14, 2022, Plaintiffs will file a Motion and supporting Memorandum addressing the outstanding discovery disputes (entitled “Plaintiffs’ Motion To Compel Responses To Requests For Production Of Documents Pursuant To Fed. R. Civ. P. 37”). As part of this Motion, Plaintiffs will attach, *inter alia*, two documents: Exhibit A which are Defendant Lorin Ashton’s Objections and Responses to Plaintiffs First Set of Requests for Production of Documents and Exhibit B which are Defendant Lorin Ashton’s Objections and Responses to Plaintiff Rachel Ramsbottom’s First Set of Interrogatories.

Pursuant to the agreement made by the parties, and pending the entry of a Protective Order in this matter, Plaintiffs seek leave to file Exhibits A and B to their Motion to Compel under seal. Based on the agreement of counsel that **all** materials be treated as confidential, filing a redacted version of these exhibits would be impracticable. *See* L.R. 5.03(c) (“If practicable, the party

requesting that some or all of a filing be sealed, shall also separately file a redacted version. If the filing of a redacted version is impracticable, the motion to seal must include an affirmative statement to that effect.”).

Counsel for Plaintiffs contacted counsel for Defendant and there is no objection to this Motion for Leave to File Exhibits Under Seal.

Based on the foregoing there is good cause for leave to file Exhibits A and B to Plaintiffs’ Motion to Compel under seal.

**WHEREFORE**, For the reasons set forth in the Plaintiffs’ Motion and corresponding memorandum of law, Plaintiffs respectfully request this Honorable Court to **GRANT** Plaintiffs’ Motion For Leave To File Certain Exhibits Under Seal.

Respectfully submitted,

**LAFFEY, BUCCI & KENT, LLP**

By: /s/ Brian D. Kent

Brian Kent\*

M. Stewart Ryan\*

Alexandria MacMaster\*

LAFFEY, BUCCI & KENT, LLP

1100 Ludlow Street, Suite 300

Philadelphia, PA 19107

(T): (215) 399-9255

(E): bkent@lbk-law.com

sryan@lbk-law.com

amacmaster@lbk-law.com

*\*admitted pro hac vice*

**MILLER LAW OFFICES**

Phillip Miller, #006873

*Attorney for the Plaintiff*

631 Woodland Street

Nashville, TN 37206

615-356-2000 phone

pmiller@seriousinjury.com

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Defendant.	)
	)

This matter is pending before the Court on Plaintiffs' Motion For Leave To File Certain Exhibits Under Seal Pursuant To L.R. 5.03 & L.R. 7.01. The Court having read the Motion and any Responses, and having fully considered the matter herein, it is hereby **ORDERED** as follows:

This \_\_\_\_ day of October, 2022.

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**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a true and exact copy of the foregoing was served on the following counsel via the Court's CM/ECF system on this 14<sup>th</sup> day of October, 2022:

Robert Peal  
Mark Lenihan  
Grace Fox  
Sims Funk PLC  
322 West End Ave, Suite 200  
Nashville, TN 37203  
(615) 292-9335  
(615) 649-8565 (fax)  
[rpeal@simsfunk.com](mailto:rpeal@simsfunk.com)  
[mlenihan@simsfunk.com](mailto:mlenihan@simsfunk.com)  
[gfox@simsfunk.com](mailto:gfox@simsfunk.com)

Kimberly Hodde  
Hodde & Associates  
40 Music Square East  
Nashville, TN 37203  
(615) 242-4200  
(615) 242-8115 (fax)  
[kim.hodde@hoddelaw.com](mailto:kim.hodde@hoddelaw.com)

Mitchell Schuster (*admitted pro hac vice*)  
Stacey Ashby (*admitted pro hac vice*)  
Meister Seeling & Fein, LLP  
125 Park Avenue, 7<sup>th</sup> Floor  
New York, NY 10017  
(212) 655-3500  
(212) 655-3535 (fax)  
[ms@msf-law.com](mailto:ms@msf-law.com)  
[sma@msf-law.com](mailto:sma@msf-law.com)

*Counsel for Defendant Lorin Ashton*

/s/ Brian D. Kent  
Brian D. Kent, Esquire